

**EX PARTE OR LATE FILED**

**MCI Communications  
Corporation**

1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
202 887 2993  
FAX 202 887 2676  
Keith.Seat@MCI.Com

**ORIGINAL**

**ORIGINAL**

**MCI**

**Keith L. Seat**  
Senior Counsel for Competitive Strategies  
Federal Law and Public Policy

June 16, 2000

Hand Delivery

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

JUN 16 2000


Re: EX PARTE -- CC Docket No. 00-65/ Application of SBC Communications  
Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to  
Provide InterLATA Services in Texas

Dear Ms. Salas:

On June 15, 2000, Brad Stillman and I of WorldCom, Inc. and Jerry Epstein and Marc Goldman of Jenner & Block met sequentially with Dorothy Attwood, legal advisor to Chairman Kennard, and Jordan Goldstein, Daniel Mah and Kevin Scott, legal advisor and interns to Commissioner Ness. In both meetings we discussed the status of WorldCom's two month long offering of residential service in Texas, and OSS and related issues in the pending application of SBC to offer in-region long distance services in the state of Texas. In particular, we discussed various problems of SBC that prevent WorldCom from being able to ramp up to commercial volumes as set forth in the enclosures, and in accord with our comments.

In accordance with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, an original and one copy of this Notice are being filed with your office.

Sincerely,



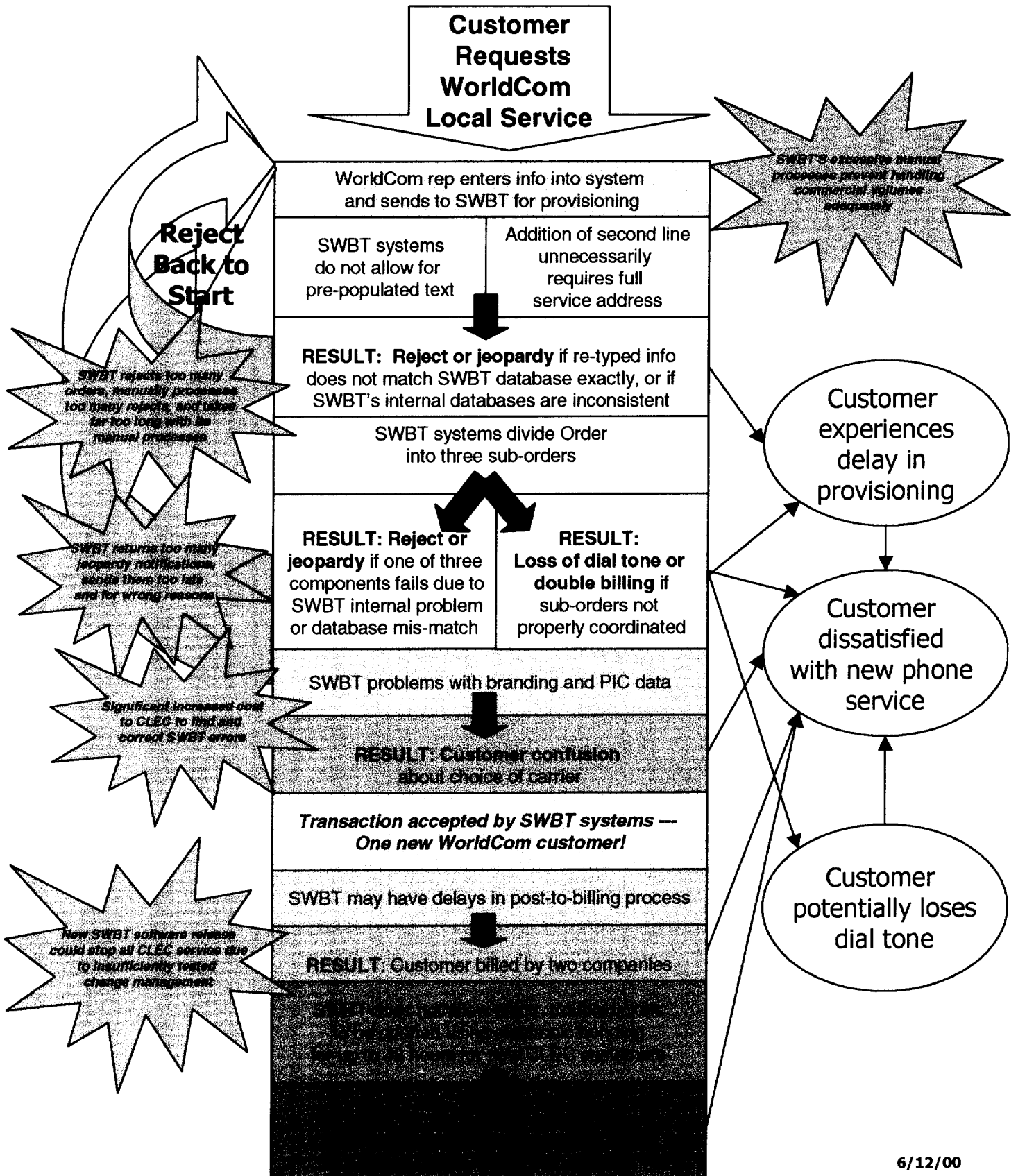
Keith L. Seat

Enclosures

cc: Dorothy Attwood  
Jordan Goldstein  
Daniel Mah  
Kevin Scott

No. of Copies rec'd 042  
List ABCDE

# Numerous SWBT Systemic Problems Result in Customer Dissatisfaction with Competition



**Status of SBC UNE-P Barriers to Residential  
Local Competition in Texas**

<b><u>Issue/Problem</u></b>	<b><u>Status as of April 5</u></b>	<b><u>Status as of June 12</u></b>
1. Trouble-tickets may be manual for first 24-48 hours	SBC fixed on March 18; some problems remain	Problem not fixed for electronic bonding, which WorldCom uses
2. Required to send full service address on every order, even if simply migrating customers	SBC fix not planned until May 27	May 27 fix helpful, but did not resolve whole problem (esp. second lines)
3. Unable to get Customer Service Records in "parsed" format to avoid excessive re-keying	Not fixed, although May 27 fix should help limit scope of problem	Not fixed; May 27 fix appears helpful, but not for second lines, directory listings and backend requirements
4. Loss of dial tone from breaking orders into three parts and failing to coordinate them	SBC "investigating" problem	Still seeing problems from use of sub-orders, but SBC making no improvements

5. LIDB I: Issue re updating customer records with SBC at time of initial order	SBC fixed after filing 271 application; production testing needed	Production use revealed serious problems that SBC has not addressed or even promised to address
6. LIDB II: Lack of adequate automated processes to update customer records with SBC <del>after</del> initial order	SBC fix contemplated, but not yet scheduled or made; no specs provided	Not scheduled before end of year; specs not yet available
7. Excessive manual handling, including too many manual rejects, and delayed manual rejects	Not fixed	Not fixed
8. Improper rejects of competitors' orders due to SBC's internal databases containing conflicting address data	Not fixed	Internal SWBT databases not fixed, although problem may be seen differently because of May 27 changes
9. Failure to properly relate multiple customer orders	Not fixed	Not fixed
10. Improper "glue" charges for UNE-Platform	SBC continues to push for charges, but not collecting until Texas PUC resolves	No change; briefs filed, but Texas PUC has not yet resolved
11. SBC performance remedy plan fails to include critical measures, such as change management	Not fixed	New measures being discussed which may reduce problem partially, but not finalized

12. SBC performance remedy plan based on number of occurrences, low per occurrence payments, and low per measurement caps insufficient to deter backsliding	Not fixed	Not fixed
13. Insufficiently tested change management	Not done	Not done
14. Key SBC pre-ordering and ordering interfaces not available for much of the night	Not fixed	Not fixed
15. Must resend orders transmitted when SBC system is unavailable	Not fixed	Not fixed; SBC says some number of orders will be held in "basket" when its system is down, but CLECs are not to rely on basket

WorldCom  
June 12, 2000